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March 15, 2022

Via ECF

Honorable Steven I Locke  
United States District Court, Eastern District of New York  
100 Federal Plaza, Courtroom 1030  
Central Islip, New York 11722

Re: Patel et al v. Singh et al.  
Case No: 2:21-cv-00759-JS-SIL  
Joint Motion to Reopen Fact Discovery

Dear Judge Locke:

This firm represents Pratik Patel and Lalit Patel (“Plaintiffs”) in reference to the above-captioned lawsuit.

I am writing on behalf of all parties to respectfully request that the Court extend the deadline to complete fact discovery by 60 days.

To date, the parties have conducted all party depositions.

From the Plaintiff’s perspective, depositions revealed a need for further post-deposition fact discovery and limited 3<sup>rd</sup> party discovery.

This is a second request for reopening of discovery deadline.

I have communicated with Defendants’ counsel and both parties are in agreement that the discovery deadline currently in place should be extended by 60 days. Accordingly, the parties jointly are respectfully requesting that fact discovery be reopened and extended by 60 days, with a pre-trial conference to be schedule on or about June 23, 2022

We thank the Court for its time and effort in consideration of this matter.

Respectfully yours,

/s/ Alexander Kadochnikov